

James W. Perkins Tel 212.801.9200 perkinsj@gtlaw.com

October 21, 2021

## VIA CM/ECF

Honorable Edgardo Ramos United States District Judge United States District Court, Southern District of New York Thurgood Marshall U.S. Courthouse 40 Foley Square, Courtroom 619 New York, NY 10007

RE: Medtronic, Inc. et al v. Walland, Civ. Action No: 1:21-CV-02908 (ER)(OTW)

Dear Judge Ramos:

Together with Maslon LLP we are counsel for Plaintiffs in the above-referenced action. We write to inform the Court that the parties are currently in active settlement negotiations.

To facilitate these negotiations, the parties respectfully request that the Court reschedule the initial conference currently scheduled for 4:15 p.m. today, October 21, 2021, to the next available date on the Court's calendar after November 18, 2021.

Counsel for Defendant Joseph F. Walland, Jr. is copied on this communication and has provided me written confirmation of Defendant's agreement to submit this rescheduling request.

Respectfully Submitted,

James W. Perkins

cc: All Counsel of Record (via ECF)